



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

November 2, 2021

VIA ECF

Hon. Katherine Polk Failla
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *Ren v. Cardinale*, No. 21 Civ. 6420 (KPF)

Dear Judge Failla:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate his Application to Register Permanent Residence or Adjust Status (Form I-485). On behalf of the government, I write respectfully to request an on-consent extension of time for the government to respond to the complaint from November 4, 2021, to January 7, 2022.

The extension is respectfully requested because USCIS has scheduled an interview with respect to the Form I-485 for November 29, 2021. The additional time is thus needed for USCIS to conduct the interview and then determine next steps, which may include proceeding to take adjudicative action on the Form I-485, thus potentially rendering this action moot.

This is the government’s first request for an extension of the deadline to respond to the complaint. If the Court grants the requested extension, the government further respectfully requests that the initial conference presently scheduled for December 10, 2021, be adjourned to January 24, 2022, or thereafter. Plaintiff consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel of record (via ECF)

Application GRANTED.

The Government shall file its response to the Complaint on or before **January 7, 2022**. The initial pretrial conference in this matter is ADJOURNED to **January 26, 2022, at 10:00 a.m.**

The Clerk of Court is directed to terminate the motion at docket entry 5.

SO ORDERED.

Dated: November 2, 2021
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE